

**BAILEY ♦ KENNEDY**  
8984 SPANISH RIDGE AVENUE  
LAS VEGAS, NEVADA 89148-1302  
702.562.8820

DENNIS L. KENNEDY  
Nevada Bar No. 1462  
JOSHUA P. GILMORE  
Nevada Bar No. 11576  
TAYLER D. BINGHAM  
Nevada Bar No. 15870  
**BAILEY ♦ KENNEDY**  
8984 Spanish Ridge Avenue  
Las Vegas, Nevada 89148-1302  
Telephone: 702.562.8820  
Facsimile: 702.562.8821  
DKennedy@BaileyKennedy.com  
JGilmore@BaileyKennedy.com  
TBingham@BaileyKennedy.com

*Attorneys for Defendants*

NGAN VAN LE, INDIVIDUALLY AND AS  
TRUSTEE FOR THE AD VITAM AUT  
CULPAM TRUST; JML HOLDINGS, LLC;  
AND JML SURGICAL CENTER, LLC

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

JOCELYNE R. UY, an individual; and  
WESTLEY U. VILLANUEVA, an individual,

Plaintiffs,

vs.

SANDY VAN, an individual; NGAN VAN LE,  
an individual; SANDY VAN, LLC dba VAN  
LAW FIRM, a Nevada Domestic Limited  
Liability Company; VAN AND ASSOCIATES  
LAW FIRM, PLLC, a Nevada Professional  
Limited Liability Company; JML HOLDINGS,  
LLC, a Nevada Domestic Limited-Liability  
Company; NGAN VAN LE as Trustee for the AD  
VITAM AUT CULPAM TRUST; JML  
SURGICAL CENTER, LLC, a Nevada Domestic  
Limited-Liability Company; DOES I through X;  
and ROE CORPORATIONS 1 through X,  
inclusive,

Defendants.

Case No. 2:24-cv-00599-GMN-DJA

**STIPULATION AND ORDER EXTENDING  
DEADLINE FOR RESPONSES TO THE  
SECOND AMENDED COMPLAINT [ ECF  
No. 31]**

**(SECOND REQUEST)**

Defendants, Sandy Van, Sandy Van, LLC dba Van Law Firm, and Van and Associates Law  
Firm, PLLC (collectively, the “Van Defendants”), by and through their counsel; Defendants, Ngan  
Van Le, individually and as Trustee for the Ad Vitam Aut Culpam Trust, JML Holdings, LLC, and

JML Surgical Center, LLC (collectively, the “Le Defendants”), by and through their counsel; and Plaintiffs, Jocelyne R. Uy and Westley U. Villanueva (together, “Plaintiffs”), by and through their counsel, hereby stipulate and agree as follows:

1. On February 19, 2025, Plaintiffs filed their Second Amended Complaint and Jury Demand Against All Defendants [ECF No. 31].

2. On March 4, 2025, the Parties stipulated to extend Defendants deadline to respond to the Second Amended Complaint from March 5, 2025, to March 26, 2025.

3. On March 5, 2025, the Court filed its Order granting the Stipulation.

4. Presently, the Van Defendants and the Le Defendants each have until March 26, 2025, to respond to the Second Amended Complaint.

5. On March 5, 2025, Plaintiffs filed their Motion for Remand Based on Lack of Subject Matter Jurisdiction (the “Motion to Remand”).

6. Defendants’ response to Plaintiff’s Motion to Remand is presently due March 19, 2025.

7. A hearing has not yet been set on the Motion to Remand.

8. The Parties agree and stipulate that the Le Defendants shall have until 14 days after the Court rules on the Motion to Remand to respond to the Second Amended Complaint.

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9. This is the second request to extend the deadline for responding to the Second Amended Complaint and is made in good faith and not for purposes of delay.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated this 19<sup>th</sup> day of March, 2025.

BAILEY ♦ KENNEDY

By: /s/ Tayler D. Bingham

DENNIS L. KENNEDY  
JOSHUA P. GILMORE  
TAYLER D. BINGHAM

Dated this 19<sup>th</sup> day of March, 2025.

JEPSEN LAW, PLLC

By: /s/ Kendra Jepsen

KENDRA JEPSEN (Bar No. 14065)

*Attorneys for Defendants*

NGAN VAN LE, INDIVIDUALLY AND AS  
TRUSTEE FOR THE AD VITAM AUT  
CULPAM TRUST; JML HOLDINGS, LLC;  
AND JML SURGICAL CENTER LLC

*Attorneys for Plaintiffs*

JOCELYN R. UY AND WESTLEY U.  
VILLANUEVA

Dated this 19<sup>th</sup> day of March, 2025.

WILSON, ELSER, MOSKOWITZ, EDELMAN  
& DICKER LLP

By: /s/ Sheri M. Thome

SHERI M. THOME (Bar No. 8657)  
NICHOLAS F. ADAMS (Bar No. 14813)

Dated this 19<sup>th</sup> day of March, 2025.

BLACK & WADHAMS

By: /s/ Silvia U. Villanueva

SILVIA U. VILLANUEVA (Bar No. 13608)

*Attorneys for Defendants*

SANDY VAN; SANDY VAN, LLC DBA  
VAN LAW FIRM; AND VAN AND  
ASSOCIATES LAW FIRM, PLLC

*Attorneys for Plaintiffs*

JOCELYN R. UY AND WESTLEY U.  
VILLANUEVA

The Court finds good cause to grant the parties' stipulation. *See* Fed. R. Civ. P. 6(b); *see* LR IA 6-1. However, in the interest of having a concrete deadline that the Court can more easily monitor, the Court will set a deadline for Defendants to file their answer, which deadline the parties may seek to extend if necessary.

IT IS THEREFORE ORDERED that the parties' stipulation (ECF No. 35) is GRANTED IN PART AND DENIED IN PART. It is granted in part regarding the parties' request for an extension of time for Defendants to respond to the complaint. It is denied in part regarding their request that the extension be dependent on a future contingency.

IT IS FURTHER ORDERED that Defendants must file their answer to Plaintiffs' second amended complaint on or before May 19, 2025.

DATED: March 20, 2025

  
DANIEL J. ALBRECHTS

UNITED STATES MAGISTRATE JUDGE